

Circuit Court for Washington County

Neal Glessner

Plaintiff

v.

Chardan, LLC, et al.

Defendants

Case No. C-21-CV-22-000156

**DEFENDANTS, CHARLOTTE AUFDEM-BRINKE, ALEXANDER THAGGARD,  
AND MICHAEL SKINNER'S MOTION TO SHORTEN TIME FOR PLAINTIFF TO  
RESPOND TO DEFENDANTS' MOTION FOR PROTECTIVE ORDER**

Defendants, Charlotte Aufdem-Brinke, Alexander Thaggard, and Michael Skinner ("Defendants"), by and through their counsel, and pursuant to Maryland Rule 2-403, hereby respectfully request that this Honorable Court shorten the time for Plaintiff to respond to Defendants' Motion for Protective Order, and state:

1. On July 6, 2023, Defendants filed a Motion for Protective Order requesting that this Honorable Court issue a protective order precluding Plaintiff from seeking Defendants' attendance at deposition until after these Defendants have had a chance to obtain discovery that has already been exchanged in the case, and been allowed a reasonable time to review such discovery.
2. As set forth in Defendants' Motion, on June 29, 2023, Plaintiff unilaterally noted the deposition of Charlotte Aufdem-Brinke for July 18, 2023, and the depositions of Michael Skinner and Alex Thaggard were unilaterally noted for July 19, 2023. Ms. Aufdem-Brinke's deposition was noted the day before Plaintiff's discovery responses are due and the depositions of Michael Skinner

and Alex Thaggard are noted on the day that the responses are due. See **Exhibit 10**, attached to Defendants' Motion for Protective Order.

3. Md. Rule 2-311(b) permits Plaintiff 15 days to respond to Defendants' Motion for Protective Order, which places Plaintiffs' deadline *after* the dates of the unilaterally noted depositions.
4. Md. Rule 1-204(a) permits this Honorable Court to shorten the time period for Plaintiff to respond to Defendants' Motion for Protective Order "on motion of any party and for cause shown."
5. Here, it would be in the interests of justice for Plaintiff to respond to Defendants' Motion for Protective Order prior to the dates of the unilaterally noted depositions, which are the subject of said motion.
6. As such, Defendants respectfully request that Plaintiff's time to respond to Defendants' Motion be shortened to Friday, July 14, 2023. This will still afford Plaintiff eight (8) days from the date of service to respond, while permitting this Honorable Court to consider both sides' arguments prior to the date of the first unilaterally noted deposition.

WHEREFORE, Defendants, Charlotte Aufdem-Brinke, Alexander Thaggard, and Michael Skinner, respectfully request that this Honorable Court shorten Plaintiff's deadline for responding to Defendants' Motion for Protective Order to July 14, 2023.

Respectfully Submitted,

/s/ Lisa M. Morgan

Lisa M. Morgan, Esquire (0612130187)

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Attorney for Defendants, Charlotte Aufdem-  
Brinke, Alexander Thaggard, and Michael Skinner

**CERTIFICATE OF SERVICE**

I hereby certify that on July 12, 2023, I served a copy of this document by e-filing it through MDEC on all parties.

/s/ Lisa M. Morgan

Lisa M. Morgan, Esquire